Remarks

Allowance of the application is respectfully requested in view of the amendments and remarks submitted herewith. Claims 1, 4-12, 15-19, 22-26 & 29-30 remain pending.

By this amendment, dependent claims 2, 3, 13, 14, 20, 21, 27 & 28 are canceled without prejudice, with the subject matter thereof being covered by the amended independent claims 1, 12, 19 & 26. The independent claims are further amended by this paper to characterize the external source as being a wirelessly coupled, portable external source, and to provide further specificity to the processing recited. In particular, Applicants' invention allows the selective activation from the power saving mode of components of the computing unit necessary to respond to a request, wherein these components do not include the central processing unit of the computing unit. Applicants' processing further includes receiving at the computing unit file location information from the external source. This file location information facilitates processing of the request by the selected activated components in a computing unit. Support for the claim amendments can be found throughout the application as filed. For example, reference paragraphs [0018], [0020]-[0022] & [0037]-[0039] of the specification as filed, as well as Figures 1-2C. No new matter is added to the application by any amendment presented.

Original claims 1-30 were rejected under 35 U.S.C. §102(b) as being anticipated by Smith et al. (U.S. Patent No. 5,167,204; hereinafter Smith). This rejection is respectfully traversed to any extent deemed applicable to the claims presented herewith.

As recited in the independent claims, Applicants' invention is a technique for conserving power in a computing unit having a plurality of components. The technique includes, during a power saving mode, receiving at the computing unit a request for service from a wirelessly coupled, portable external source. The request for service includes a request to save data on one of the components of the computing unit or a request to retrieve data from one of the components of the computing unit. The technique further includes determining which components of the computing unit are required to respond to the request for service while maintaining power saving mode, and selectively activating from a power saving mode the components of the computing unit necessary to respond to the request, wherein the selectively activated components do not include the central processing unit of the computing unit. The technique further includes receiving at the computing unit file location information from the external source to facilitate

processing of the request by the selectively activated components of the computing unit, and responding to the request using the file location information and the selectively activated components of the computing unit.

In accordance with Applicants' invention, the central processing unit of the computing unit remains in power saving mode, while only those components necessary to process a request to save data on one of the components of the computing units or a request to retrieve data from one of the components are activated. Because the central processing unit remains in power saving mode, the external source provides the computing unit with file location information for the selectively activated components of the computing unit needed to respond to the request to save data or to retrieve data.

With respect to the initial rejection, it is well settled that there is no anticipation of a claim unless a single prior art reference discloses (1) all the same elements of the claimed invention; (2) found in the same situation as the claimed invention; (3) united in the same way as the claimed invention; and (4) in order to perform the identical function as the claimed invention. In this instance, Smith fails to disclose various aspects of Applicants' invention as recited in the independent claims presented, and as a result, does not anticipate (or even render obvious) Applicants' invention.

Smith describes a power management approach for a laptop computer with slow and sleep modes. The approach provides power and clocking control to various units within the computer in order to conserve battery power. Transistor switches controlled by the power manager control the distribution of power and/or clock signals to the various units within the computer. The power manager includes a software routine for continually monitoring the various units and when these units are either not needed and/or not currently in use, power and/or clock signals are removed from a given unit. (See Abstract.)

Initially, Applicants respectfully submit that Smith does not teach or suggest their recited process for conserving power within an environment wherein a wirelessly coupled, portable external source requests data to be saved to or retrieved from a component of a computing unit. A careful reading of Smith fails to uncover any suggestion of a wirelessly coupled, portable external source to the computing unit initiating a request for service, wherein the request for service is a request to save data to or retrieve data from one of the components of the computing

unit. In Smith, PMGR 11 awakes from sleep mode with any input from I/O controller 19a. Smith teaches that this I/O input is typically a pressing of a key on the keyboard and/or movement of the cursor control device. (See column 8, lines 21-26 of Smith.) For at least this reason, Applicants respectfully submit that the independent claims are not anticipated by Smith, nor obvious in view thereof.

Additionally, Applicants recite a power saving technique wherein the request for service from the wirelessly coupled, portable external source initiates a selective activation, from the power saving mode, of one or more components of the computing unit necessary to respond to the request. These one or more components of the computing unit do not include the central processing unit of the computing unit. In Smith, CPU 12 is activated when computer 10 awakes from its sleep state. For example, reference column 9, lines 40-42 where Smith states that CPU 12 provides various commands to PMGR 11 for connecting the Vcc power to applicable devices as needed. In the examples of Smith, the CPU 12 is considered a necessary one of the components to be activated from the sleep mode. In comparison, Applicants' processor 114 of computing unit 110 of FIG. 1 is not activated when the request for service is a request to store data to or retrieve data from one of the components of the computing unit. In Applicants' invention, the selective activation is via an input/output server 140 and power management subsystem 130, neither of which comprise or require the central processing unit (e.g., processor 114) in order to respond to the request for service.

Advantageously, by providing processing that allows for the response to the request without activating the CPU, Applicants' technique is able to more efficiently conserve power, while still accomplishing transfer of the requested data between the wirelessly coupled, portable external source and the computing unit. Since Smith fails to teach or suggest processing which would enable response to a request from an external source without powering the central processing unit, Applicants respectfully submit that the independent claims presented herewith patentably distinguish over the teachings of Smith.

The amended independent claims further recite receiving at the computing unit file location information from the external source. This file location information facilitates processing of the request by the selectively activated components of the computing unit. The file location information is provided since the central processing unit of the computing unit remains

in power saving mode during Applicants' processing. The selectively activated components employ the file location information in responding to the request to save data on or retrieve data from the computing unit. Applicants respectfully submit that a careful reading of Smith fails to uncover any teaching or suggestion of similar functionality. This is in part because Smith teaches that the CPU 12 is powered when computer 10 wakes up from the sleep mode. For this additional reason, Applicants respectfully submit that Smith does not anticipate, or even render obvious, Applicants' invention.

For all the above reasons, Applicants respectfully request reconsideration and withdrawal of the anticipation rejection to their independent claims 1, 12, 19 & 26.

The dependent claims are believed patentable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their own additional characterizations. For example, claims 4, 15, 22 & 29 recite the subject matter of their respective independent claims, as well as characterizing that the request as a request to synchronize data between the computing unit and the external source. Applicants respectfully submit that a careful reading of Smith fails to uncover any teaching or suggestion of synchronizing data between a computing unit and an external source. In this regard, the Office Action references at page 3, paragraph 7, column 9, lines 55-62 of Smith. These lines state:
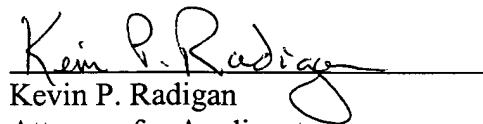
> … That is, software is used to control the powering on and off of the respective devices. Thus, the power of the disk control unit 20 also powers the floppy disk, the power to the parallel communications controller 23 also powers its associated peripheral device, such as the hard disk. The drivers of the serial communications controller 21 and the power to the sound drivers 24 are also controlled as needed.

Applicants respectfully submit that these lines of Smith are not applicable to the recited subject matter of the dependent claims at issue. In Applicants' claimed invention, the request specifically is a request to synchronize data between the computing unit and the wirelessly coupled, portable external source. No similar functionality is implied or inherent in the above-summarized discussion of the drivers of Smith.

All claims are believed to be in condition for allowance and such action is respectfully requested.

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Should the Examiner wish to discuss this case further with Applicants' attorney, the Examiner is invited to telephone their below-listed representative.

Respectfully submitted,

Kevin P. Radigan
Attorney for Applicants
Registration No.: 31,789

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HESLIN ROTHENBERG FARLEY & MESITI P.C.
5 Columbia Circle
Albany, New York 12203-5160
Telephone: (518) 452-5600
Facsimile: (518) 452-5579